

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

|  |   |                           |
|--|---|---------------------------|
| SCOTT RODGERS<br><br><div style="text-align: right; padding-right: 20px;">Plaintiff</div>                                      | ) | C.A. No. 04-11842-PBS     |
| v.   | ) | <b>JOINT STATEMENT OF</b> |
| CORRECTION OFFICER ORCHID,<br>UNKNOWN CORRECTION OFFICER JOHN<br>DOE, JOE WHITMORE, DR. HOWARD,<br>JOHN SMITH, PLYMOUTH COUNTY | ) | <b>PROPOSED PRETRIAL</b>  |
| <div style="text-align: right; padding-right: 20px;">Defendants</div>  | ) | <b>SCHEDULE</b>           |

Now comes the Plaintiff Scott Rogers in the above-captioned case and submits his Statement of Proposed Pretrial Schedule in accordance with this Court's Notice of Scheduling Conference dated March 7, 2005, and Local Rule 16.1. The parties have conferred and have reached agreement regarding a proposed schedule.

| 1. Discovery Plan  | DATE     |
|--|----------|
| A. Automatic discovery requirements under Rule 26(a)(1)(A)-(D)                                       | 05/09/05 |
| B. Written discovery to be filed and answers/responses to be filed within time provided by the rules | 08/30/05 |
| C. Completion of Depositions (except Depositions of Experts)   | 12/30/05 |
| D. Plaintiff's Expert to be Designated   | 3/30/06  |
| E. Defendants Expert to be Designated  | 5/30/06  |
| F. Expert Depositions Completed  | 7/30/06  |

**2. Proposed Schedule for Filing of Motions**

|  |         |
|--|---------|
| A. Motion to Dismiss or for Summary Judgment             | 5/31/05 |
| B. Response to Motion to Dismiss or for Summary Judgment | 6/30/05 |

- C. All remaining dispositive motions to be filed 9/30/06
- D. Responses to dispositive motions to be filed 10/30/06
3. The parties propose that a trial by jury be scheduled for: 4/01/07

Respectfully submitted,  
The Plaintiff Scott Rodgers,  
By his attorneys,

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The Defendants Plymouth County  
Sheriff's Department,  
By their Attorney,

//S//Patrick C Lee  
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Dated: May 3, 2005